

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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U.S. DISTRICT COURT
SAN JUAN, P.R.

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

CIVIL NO.: 17-BK-03283 (LTS)

Plaintiff,

PROMESA

As representative of

TITLE III

THE COMMONWEALTH OF PUERTO
RICO

Debtor₁

**RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE ONE
HUNDREDTH TWENTY SIXTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF
THE COMMONWEALTH OF PUERTO RICO AND EMPLOYEES RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO
[ECF NO. 9895]**

TO THE HONORABLE COURT:

COMES NOW creditor **MIOSOTIS CRUZ CRUZ**, on her own behalf (pro-se), and respectfully responds in opposition to the 126th Omnibus Objection (Non-Substantive) of The Commonwealth of Puerto Rico [ECF No. 9895] "the Objection", and states and prays as follows:

1. The Commonwealth of Puerto Rico ("Debtor") has objected to creditor MIOSOTIS CRUZ CRUZ's timely filed proof of claim number 121746 as deficient.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. MIOSOTIS CRUZ CRUZ has filed a valid proof of claim pertaining to unpaid salaries claimed on her own behalf as a qualifying social worker who has been employed by the debtor's Department of Education from August 4th, 2010 to present.

3. This claim is related to the state law number 89 of 1979, commonly known as "Romerazo Law" and "Ley de Retribución Uniforme", a law that was approved in 1979 to increase the salaries of all qualifying teachers working for the Department of Education.

4. The exact quantity of the claim is in possession of the debtor, who has the responsibility to calculate the salary increase steps and who keeps the creditor's official employee file. The salary increase calculations are a highly technical issue modified by state courts, at the collective bargaining table and at administrative levels along the years, before filing the present case 17-BK-03283. At the moment, the debtor owes the claimant in excess of \$44,000.00.

5. I am accompanying additional documents that sustain my claim. The best evidence as previously stated is in possession of the debtor.

6. In relation to Debtor's Objection No. 145, Prime Clerk Claim No. 121746, MIOSOTIS CRUZ CRUZ moves the Court to deny the Debtor's objection. I, MIOSOTIS CRUZ CRUZ expressly reserve any rights in connection therewith and request that, the non-substantive disallowance requested by Debtor should not prejudice MIOSOTIS CRUZ CRUZ's rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

I hereby certify I have served notification of this document by postal mail to Counsel for the Oversight Board and Counsel for the Creditors' Committee, as directed in the abovementioned Omnibus Objection.

In Hormigueros, Puerto Rico, on this 5th day of March 2020.


s/ MIOSOTIS CRUZ CRUZ

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